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November 23, 2021

VIA ECF

The Honorable Judge Ronnie Abrams
United States District Court Judge
Southern District of New York
40 Foley Square, Courtroom 1506
New York, New York 10007

Re: Caitlin Gelles v. SintecMedia, NYC, Inc. d/b/a Operative, et al.
Case No.: 1:21-cv-08578-RA

Dear Honorable Judge Abrams:

The undersigned is counsel to Plaintiff Caitlin Gelles (“Plaintiff”) in the above-referenced matter. I write with the consent of counsel for Defendants SintecMedia, NYC, Inc. d/b/a Operative, Lorne Brown, Lance Roncalli, and Jason Witt (collectively “Defendants”) to respectfully request an extension of the deadline to file Plaintiff’s Complaint from November 19, 2021, up to and until November 30, 2021.

Plaintiff started this action by filing a Summons with Notice in the New York State Supreme Court, New York County on September 28, 2021. Defendants accepted service of the Summons with Notice on October 12, 2021, and thereafter removed this case to this Court on October 19, 2021. Counsel for Defendants then filed a letter with this Court requesting that a pleadings schedule be entered and on October 29, 2021, this Court entered an Order setting the November 19, 2021, Complaint filing deadline [Dkt No. 5].

However, Counsel for Plaintiff did not receive an ECF notification of the October 29, 2021, Order and only learned about the November 19, 2021, deadline after she was notified of such deadline today by Counsel for Defendants. Counsel for Plaintiff has since filed a Notice of Appearance to ensure that all ECF notifications are timely received. The short extension of the November 19, 2021, deadline is needed because Counsel for Plaintiff is currently dealing with a sick baby and no childcare. Counsel for Defendants has given his consent of this request. No order deadline in the October 29, 2021, will be affected by this request.

We thank the Court for its time and attention to this matter and its consideration of this request.

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Respectfully submitted,

GODDARD LAW PLLC

By: /s/ Megan S. Goddard

Megan S. Goddard, Esq.

cc: All Counsel of Record Via ECF

Application granted.

SO ORDERED.



Hon. Ronnie Abrams

November 24, 2021